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## **MEMO ENDORSED**

July 25, 2007

## By HAND

The Honorable Denise Cote
United States District Judge
United States District Court for the Southern District of New York
United States Courthouse
500 Pearl Street, Room 630
New York, New York 10007-1312

USDC SDNY
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Re: DB Structured Products, Inc. v. Mortgage Corporation	•
of America, Inc., d/b/a Zone Funding	07 CV 4106
DB Structured Products, Inc. v. Baltimore	
American Mortgage Corporation, Inc.,	07 CV 4109
DB Structured Products, Inc. v. First Capital Mortgage Corp.	07 CV 4115
DB Structured Products, Inc. v. Prajna	
Group, Inc., d/b/a Liberty Mortgage Funding,	07 CV 4116 ←
DB Structured Products, Inc. v. ACT Lending Corporation,	07 CV 4117
DB Structured Products, Inc. v. Commonsense Mortgage, Inc.,	07 CV 4118
DB Structured Products, Inc. v. Lender Ltd.,	07 CV 4119
DB Structured Products, Inc. v. Maribella Mortgage, LLC,	07 CV 4120
DB Structured Products, Inc. v. Lancaster Mortgage Bankers, LLC,	07 CV 4121
DB Structured Products, Inc. v. Great Northern Financial Group, Inc.,	07 CV 4122
DB Structured Products, Inc. v. Investaid Corporation,	07 CV 4123
DB Structured Products, Inc. v. Cameron Financial Group, Inc.,	07 CV 4124
DB Structured Products, Inc. v. Transnational Financial Network, Inc.,	07 CV 4125
DB Structured Products, Inc. v. Bayrock Mortgage Corporation,	07 CV 4126
DB Structured Products, Inc. v. iFreedom Direct	
Corporation, f/k/a New Freedom Mortgage Corporation,	07.CV 4127

## Dear Judge Cote:

Our firm is counsel to the Plaintiff in the fifteen referenced actions pending before Your Honor. We write to request an adjournment of the initial pre-trial conferences currently scheduled for August 3, 2007. Specifically, we request that the initial pre-trial conferences for the above cases be adjourned as follows:

New York, NY

Washington, DC

White Plains, NY

Summit, NJ

México City, Mêxico

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- 1. The conference for DB Structured Products, Inc. v. Lender Ltd., 07 CV 4119 be adjourned to September 7, 2007 at 2:00 p.m.;
- 2. The conferences for DB Structured Products, Inc. v. Great Northern Financial Group, Inc., 07 CV 4122 and DB Structured Products, Inc. v. Transnational Financial Network, Inc., 07 CV 4125 be adjourned to September 21, 2007 at 2:00 p.m.; and
- 3. The conferences for all of the remaining matters above be adjourned until September 14, 2007 at 2:00 p.m.

All parties who have appeared or who have otherwise contacted us (defendants in eight of the fifteen cases) have consented to this request. This is the first request for an extension of this deadline.

As to the fifteen litigations, defendants in seven cases are in default, two cases have resulted in active settlement discussions, and the remaining six cases are expected to be contested litigations. We expect to apply for default judgment against the seven defaulting defendants pursuant to the Court's Default Judgment Procedure prior to the adjournment dates requested above.

If the Court has any questions, please do not hesitate to contact me at (212) 912-7417 or Brendan Zahner at (212) 912-7622.

Respectfully submitted,

JDoherty@tow.com

Cc(via facsimile):

Peter J. Fazio Warren Wynshaw Mark Kaufman Linden Thomas Michael DiChiaro Kenneth Bressler Gary Harris

08/01/07 WED 10:29 [TX/RX NO 9982] 2003